Schapiro Exhibit 103

User Abuse Manual

Atom Entertainment, Inc. for Addicting Clips and Any Other Applicable Sites.

2006

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Introduction

- User generated content should never be monitored

Something that can't bear enough repeating is that the User Abuse Team, and Atom Entertainment in general, does not, and should not, actively monitor any of its Web sites for content violations regarding content submitted or generated by its users. The Abuse Team reviews a site only after receiving a complaint from an outside party, or if alerted by an Atom Entertainment employee who encountered a seemingly objectionable website in the course of performing normal job duties.

[redacted]

- Implications of hit content

[redacted] The need to avoid losing popular content needs to be balanced against the ramifications of potential bad publicity for hosting legal, yet objectionable, content.

Important: If none of the recommendations in this manual happen to apply to the case at hand, please don't hesitate to consult our legal counsel (Victoria Libin or Adam Lovingood), or Scott Roesch, or both. If legal counsel or Scott is not available to discuss the matter, then bring it to the attention of Margaret McCarthy.

- Removal of offending material: Site or account?

It's up to you to determine whether it's in our best interest to delete just the offending piece of content, or the account altogether.

[redacted]

- Password protection

Addicting Clip's password protection feature for sharing content privately is a useful tool for keeping family, club, adult, and other content private.

[redacted] Therefore, if we receive a complaint about content behind a password, it should be removed.

- Risk analysis

[redacted]

Messaging Procedure

- Maintaining the proper tone

One of the more difficult aspects of working in abuse administration is handling difficult correspondents – both complainants and abusers. A parent reporting pornography on a our site can be as difficult to placate as an advertiser demanding to know why his ad was shown next to offensive content. A number of correspondents will resort to the full range of abusive language, from profanity to promises of legal action.

If a message contains nothing but insults and obscenities, the best course of action is to simply not answer it. Occasionally, however, people get justifiably frustrated, and deserve a response despite the surface profanity.

Rule #1: Maintain an even tone at all times. Never escalate the tenor of the exchange, or match abuse for abuse. Make an effort to set limits. If you say too much or make excessive assurances

or concessions – or go overboard in admitting error – the complainant (or abusive user) will do his best to exploit the language you use to his benefit. Depending on the circumstances, the goal in abuse messaging is to strike the right balance between being specific and being vague, being receptive and being firm.

Rule #2: Never give legal advice. [redacted]

- The importance of notifying abusers

Make sure you notify all abusers of actions taken. [redacted]

Most deletion canned emails are deliberately vague, and simply state the following:

```
It was brought to our attention that your content violated our terms of
service. It was therefore removed from the AddictingClips web site.
```

Some abusers will know exactly what we are referring to, and will not reply. Others will demand a more detailed explanation. In such cases, it is best to invoke the terms of service, for example:

```
Thanks for your message. Our records indicate that your site content
violated one or more terms of Section 4 of our Terms of Use, which
states that users may not:

create a user name or screen name or upload to, distribute through or
otherwise publish through the Site any Materials which are indecent,
libelous, defamatory, obscene, threatening, invasive of privacy or
publicity rights, abusive, illegal, harassing, contain expressions of
hatred, bigotry, racism or pornography, or are otherwise objectionable,
or that would constitute or encourage a criminal offense, violate the
rights of any party or violate any law.
```

If the user demands more specific details of the violation, it is up to you whether to reply. [redacted]

- Ending an exchange

Some abusers are unusually tenacious in demanding to know why their accounts were closed. It is a bad idea to become ensnared into telling abusers exactly why you made your decision. Doing so will only guarantee sustained and ridiculous debate. Try not to let an exchange run to more than three messages total: Original notification, (their) response, and (our) clarification.

- Invoking the User Agreement

[redacted]

- The 'passive conduit' disclaimer

All responses to persons who send original complaints must contain the following disclaimer:

As a passive conduit, we cannot monitor user websites, but we respond to breaches of our Terms of Service when we learn of such behavior.

[redacted]

- The multiple-violation rule

If a user account has three or more content violations that separately might not warrant an outright account deletion, it may be desirable to terminate the account and delete all content submitted by the user. [redacted]

[redacted]

- Messaging nuts and bolts

Theoretically, more than half of all abuse messages will be notices to users informing them that we deleted infringing content after receiving a complaint, and are therefore originated messages.

Please follow the procedures below when responding to the complainant and notifying the abusive user.

- All responses to the complainant should bear the subject line "Atom Entertainment Abuse Team"
- All account-deletion messages to the abusive user should also bear the subject line "Atom Entertainment Abuse Team", followed by the case number of the complainant's original message (ex.: Atom Entertainment Abuse Team [Case# 1654994])

(In short, all originated messages should have a case# in the subject line)

- Always begin the message to the complainant (and to the user who write back to complain) with "Thank you for your message"
- Always use the standard Abuse Team signature – no names, please! You can make an exception to this rule when messaging law-enforcement personnel, Better Business Bureau staffers, and select others.

Make sure you record all account deletions and reactivations on a spreadsheet that you keep in your user folder. You should have a number for the user's login, email, type of content, and type of abuse.

Dealing with the authorities

- Our privacy policy

Ordinary citizens, parents, students, school administrators, foreign law-enforcement officials and attorneys often assume that we will disclose the identity of users upon request. These parties must be informed that we will not release such information without a court order:

```
Atom Entertainment, Inc. acknowledges and has considered your request
that we divulge the identity of the user in question.  However, in
light of our privacy policy, we are unable to comply with your request.

Atom Entertainment, Inc. will, however, disclose user account
information upon receipt of a valid court order and we will notify the
user of such order prior to any disclosures.
```

- Court orders

Sometimes law enforcement or other government Agencies will email demanding user information after the see porn or other illegal clips. In order for us to release basic user information, we require a subpoena, and to release more specific information, such as IP logs, we require a search warrant.

Something important to remember is that we are obligated by law to notify the user before disclosing any personal information. [redacted]

[redacted]

- Procedure

When you receive a court order, whether it's a subpoena or search warrant, have our legal counsel review it. [redacted]

[redacted]

Following is an example of a letter responding to a court order:

April 15, 2005

IA Helen Ramirez
Federal Bureau of Investigation
2500 E. TC Jester
Houston, TX 77008

VIA FACSIMILE

Case number 305A-BA-80998-AS6611-HO

Dear Investigator Ramirez,

The information supplied in this facsimile is in response to the subpoena requiring information for the account referenced as addictingclips.com/xxxxmachine.

Unfortunately, we have a policy of deleting content from accounts that have terminated.

Nevertheless, the account's registered e-mail address (which was supplied upon registration) is still intact in our records, as are the dates for the creation of the account, and the last login to the account. They are as follows:

Please let me know if you have any questions regarding the above information.

Regards,

Bob Tarter
Abuse Administrator
Atom Entertainment, Inc.

- Notifying the User about a warrant or subpoena

As mentioned earlier, we will need to notify the user that we have received a subpoena ordering us to disclose his identity (or his site content, or both). Unless the court order contains explicit language ordering us not to notify the user, we must contact him at his account's registered e-

mail address notifying him of the court order and giving him the opportunity to file a petition and obtain a protective order to block the disclosure.

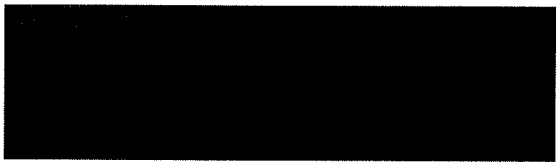
Below is an example of such a notification, sent by e-mail:

```
Hello,

We have received a subpoena from the Hinterland County (Texas) Prosecutor's
Office ordering us to disclose user information for your Addicting Clips
account, which was referenced in the subpoena under the URL
greatpyramid.addictingclips.com. The subpoena was dated March 19, 2006.  We are
providing this notification as a courtesy.

The Subpoena requires that responsive documents be produced no later than April
5, 2006. If you object to these documents being produced, you must obtain a
protective order or other court order that relieves Atom Entertainment, Inc. of
its legal obligation to respond to the Subpoena.

For further information concerning the Subpoena, you may contact the attorney
who served the Subpoena:
```



```
Please let us know if you have any questions.

Regards,

Abuse Administrator
Atom Entertainment, Inc.

Cc Victoria Libin, Sr. Director of Legal Affairs
```

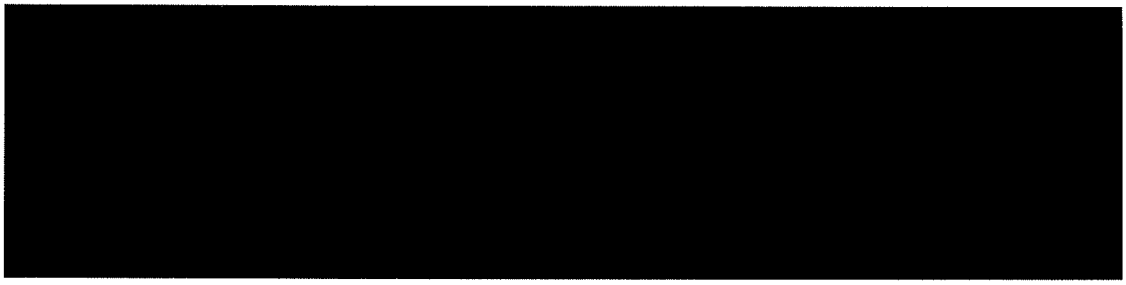
Note: The deadline for receiving the documents blocking our obligation to disclose user information should be ten working days after the date of the court order (as in the March 19 – April 5 example above). Always make sure that the original deadline in the subpoena or court order requesting disclosure is met. If it is not possible to meet the deadline, have legal counsel request an extension.

If you receive paperwork before the stated deadline that blocks disclosure, have our legal counsel review it. Once s/he has confirmed that the paperwork is legitimate, immediately contact the authorities who issued the subpoena. Write a cover letter detailing our Privacy Policy and procedure for notifying users about disclosure of their information, and fax along the paperwork you received from the user. Notify the user that you have received his documents, and have faxed copies to the authorities who issued the subpoena (Keep our legal counsel informed of what you are doing at all times; you will need assistance from her on the specifics).

Important:

- Make sure you keep copies (or originals) of <u>all</u> associated paperwork, including e-mails.
- In all correspondence, be as specific as possible about dates.

- Abusive discussion board entries or reviews



- Referring people to the police

Complainants who alert us to threatening site content that appears likely to cause physical harm or is evidence of a crime should be referred to the local authorities with the following response:

```
We are anxious to work with you to resolve this matter.

Atom Entertainment's privacy policy precludes us from giving out our
registered user information except to legal authorities.

Therefore, please have your local police department (or other law
enforcement agency) contact our legal department.  Here is the contact
information for our legal team:

Legal Department
c/o Atom Entertainment, Inc.

225 Bush, Suite 1200, San Francisco, CA 94104

FAX:  (415) 503-2425

As a passive conduit, Atom Entertainment, Inc. cannot monitor user
content, but we respond to breaches of our Terms of Service when we
learn of such behavior.
```

- Dealing with parents

You may find it desirable to employ a more personal tone when dealing with parents of minors who are affected by user abuse – especially when the children are the objects of the abuse, which is often cruel.

- Threats to Atom Entertainment

All physical threats to our company, whether they involve hacking our network, bombing our offices, or inflicting physical harm on Mika, our board users, our management team, or our employees, must be reported immediately to a local field office of the FBI. If the threat is contained in a discussion board entry or a review, send the FBI the IP address obtained by our technical people; if the threat is contained in an e-mail, make sure you include the full header along with the message body.

Here is our contact information for the FBI:

[redacted]

Following is an example of a faxed letter to the FBI:

July 2, 2005

National Infrastructure Protection Center
J. Edgar Hoover Building
935 Pennsylvania Ave, NW
Washington, D.C. 20535-0001

VIA FACSIMILE

Hello,

Atom Entertainment, Inc. is a company providing user generated content and other short format entertainment through various websites, including www.addictingclips.com.

On the afternoon of Wednesday, June 27, a disgruntled user posted hacking and bombing threats on one of our community discussion boards.

Here is the text of the post, with the threat highlighted in boldface:

This is not fair. I have not only spent alot of time submitting film clips to AddictingClips, as a fairly new user, but also spent over an hour reviewing various films, Atom Entertainment sites will get hacked on July the 9th, I plan to destroy Atom Entertainment, Inc.s headquarters on 07/09/01,

[redacted]

Following is the IP information we were able to obtain. (Please note that the the last IP is from an Inktomi cache server somewhere in London similar to the kind AOL uses):

[redacted]

[redacted]

Here is the personal information we have in our records regarding this user:

[redacted]

While we have reason to believe that the threat was simply an ill advised attention-grabbing scheme, we have decided, as a matter of policy, to report all physical threats to the FBI.

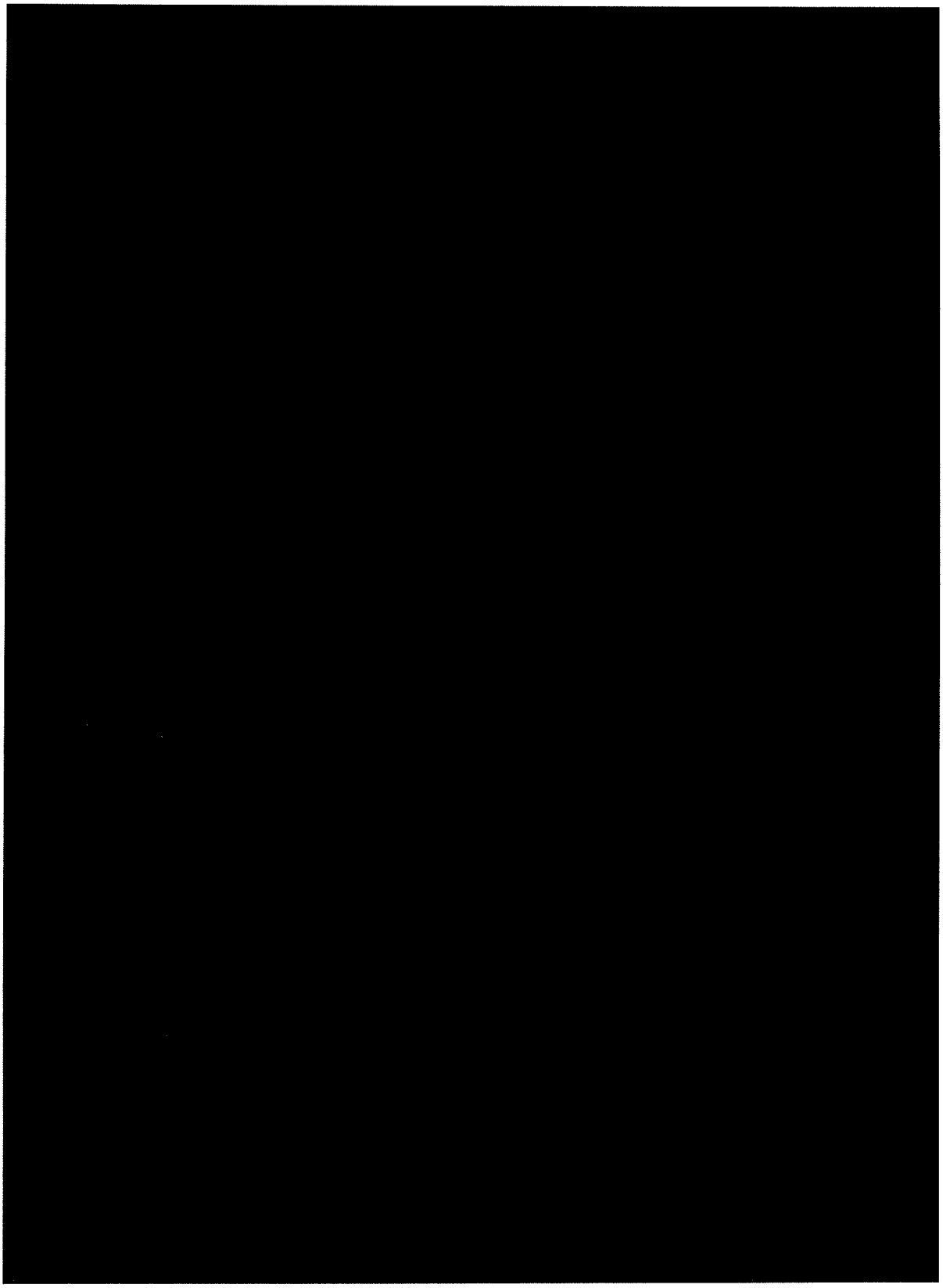
Because the threat against Atom Entertainment jeopardizes the integrity of our servers as well as the safety of our employees, thereby creating potential liability for Atom Entertainment, Inc., we in good faith believe that disclosure of the information we have provided in this letter is both necessary and appropriate.

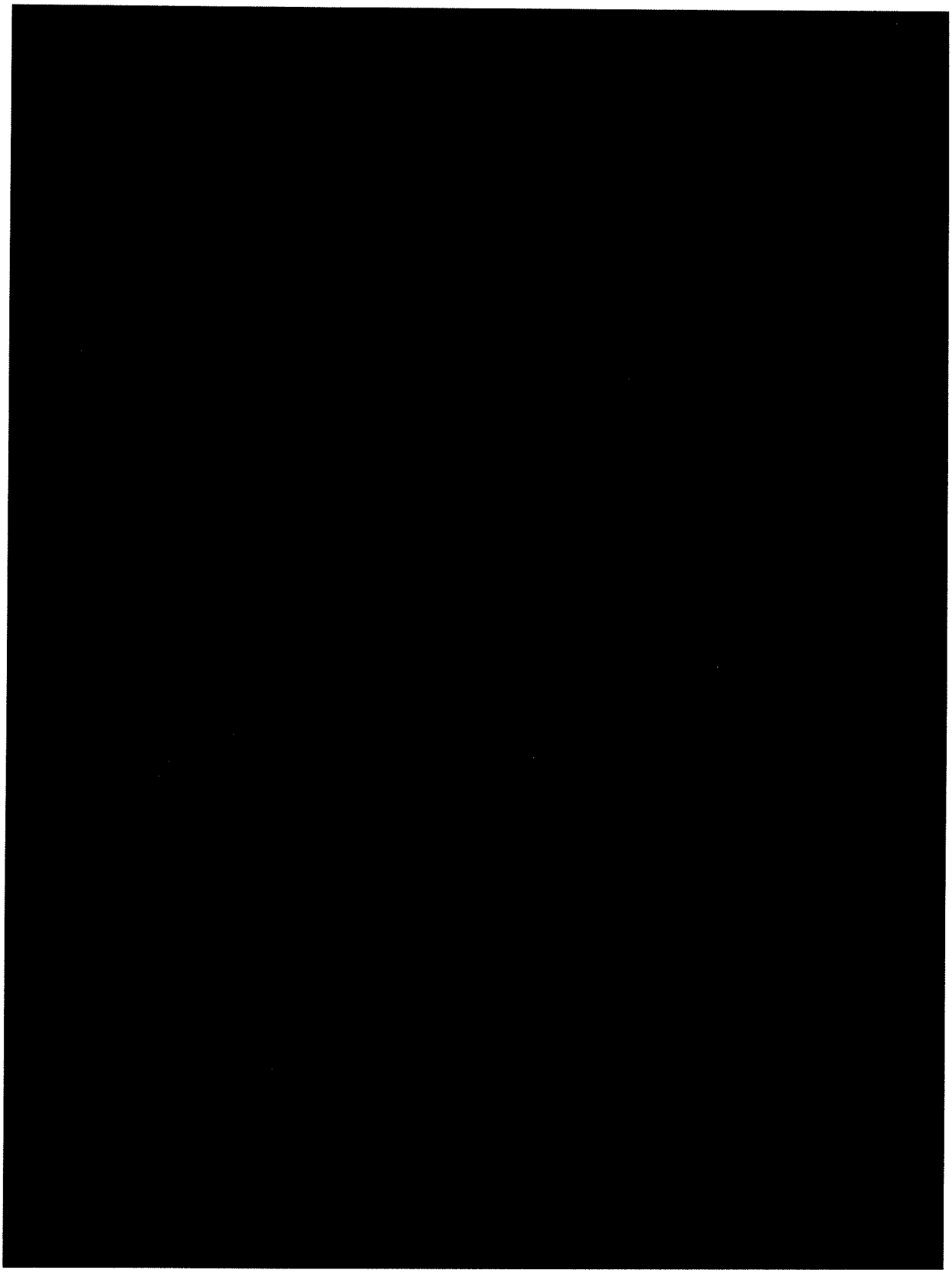
Regards,

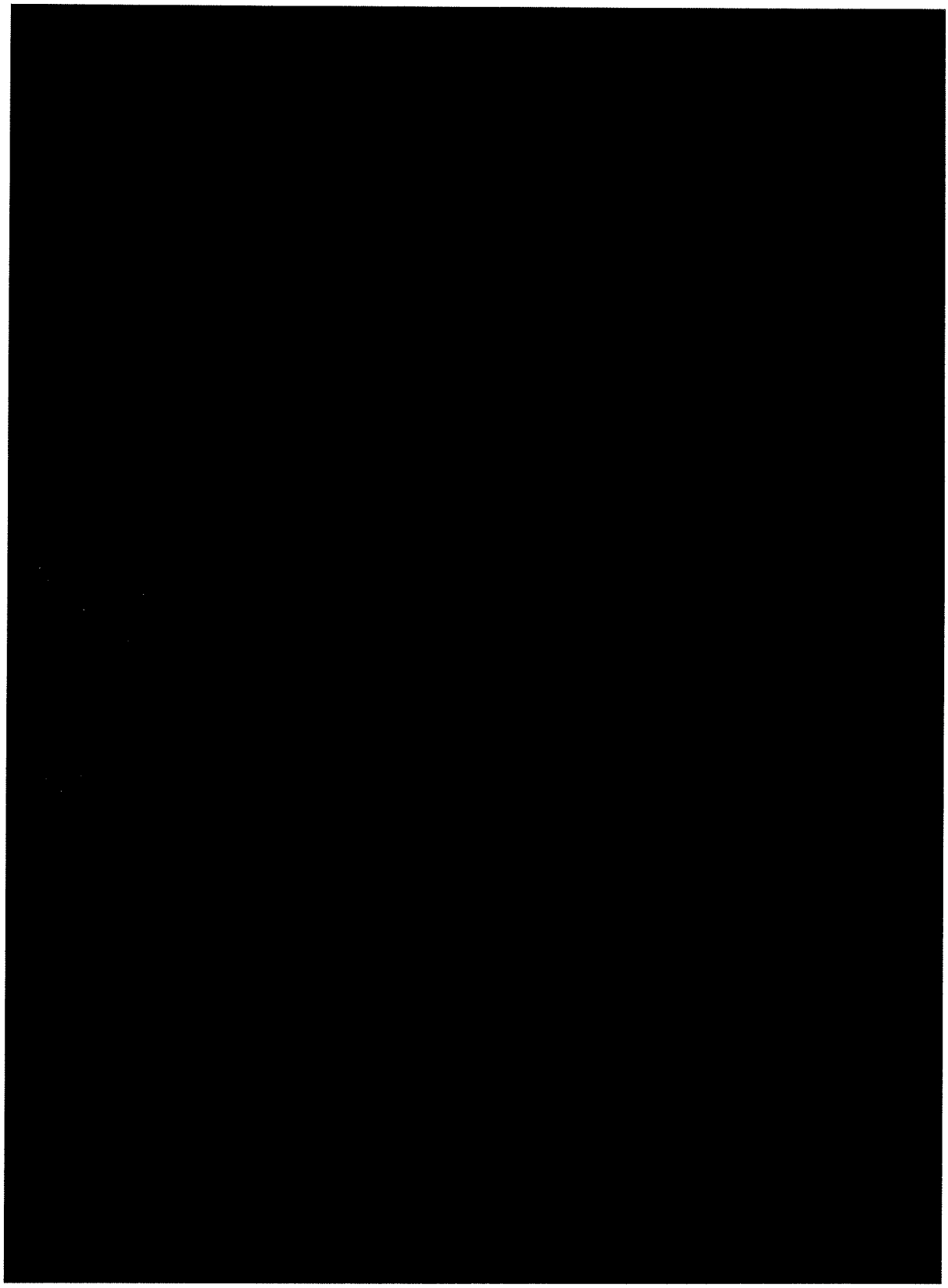
Bob Tarter
Abuse Administrator
Atom Entertainment, Inc.

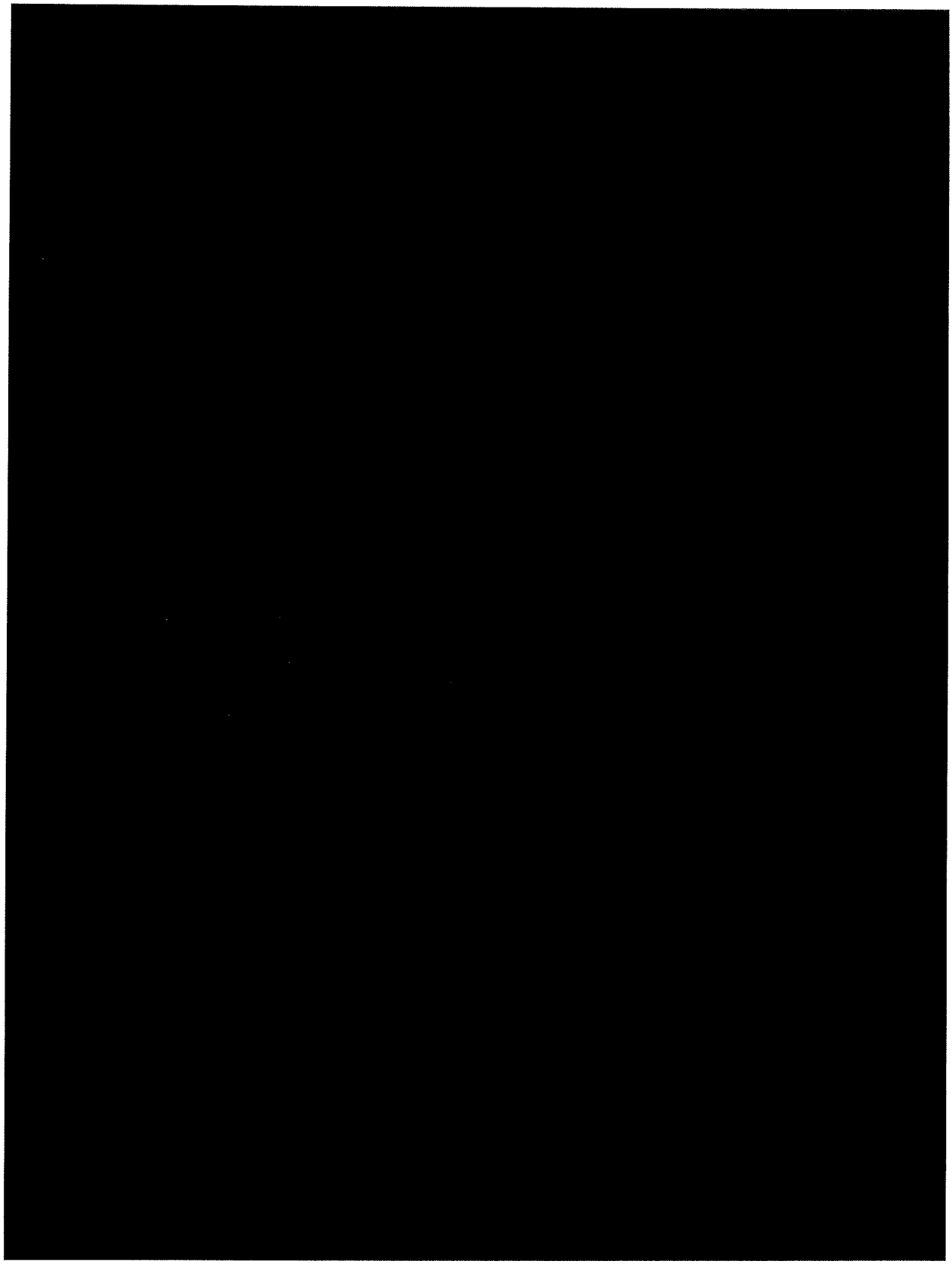
Copyright and other Intellectual Property Infringement

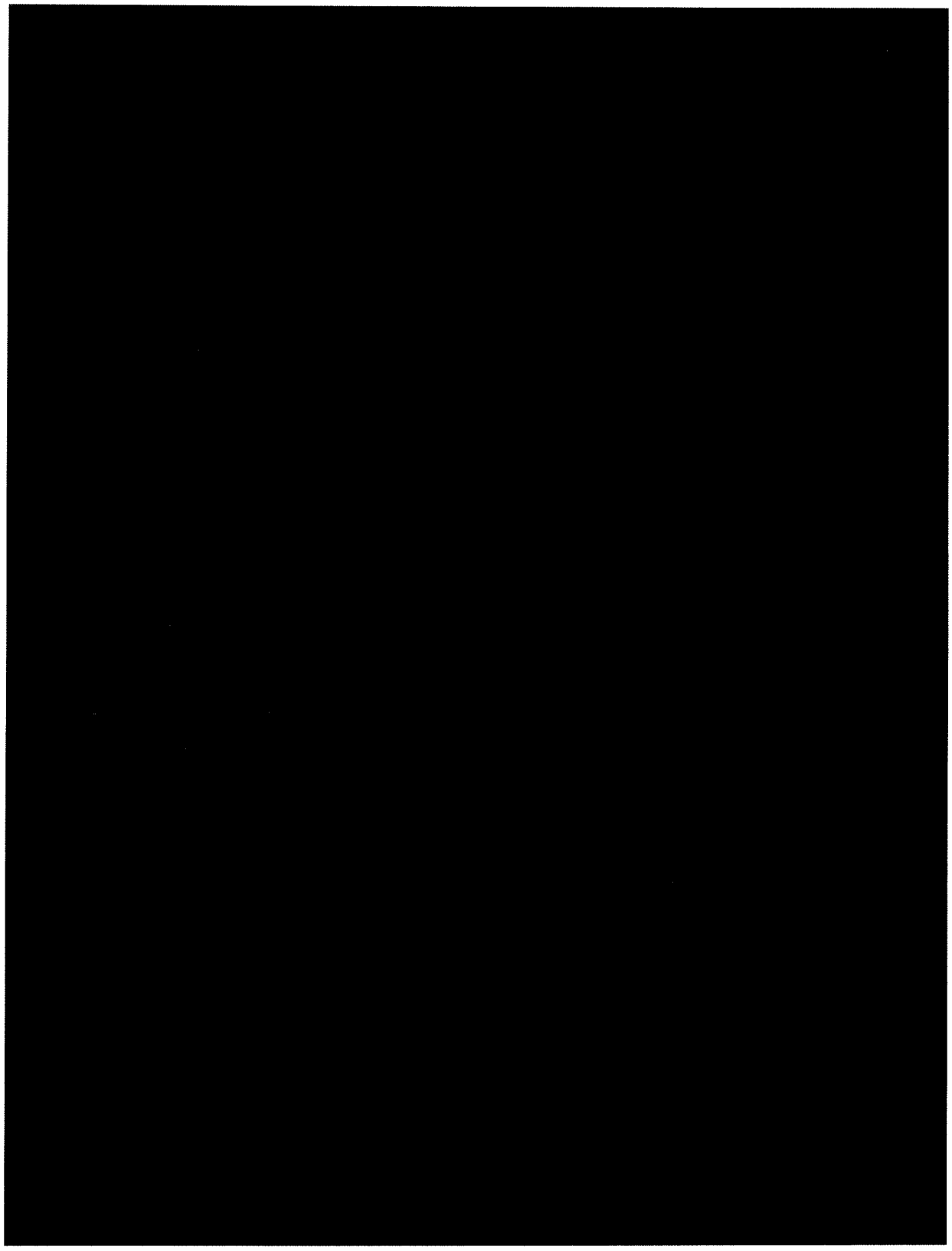
[redacted]

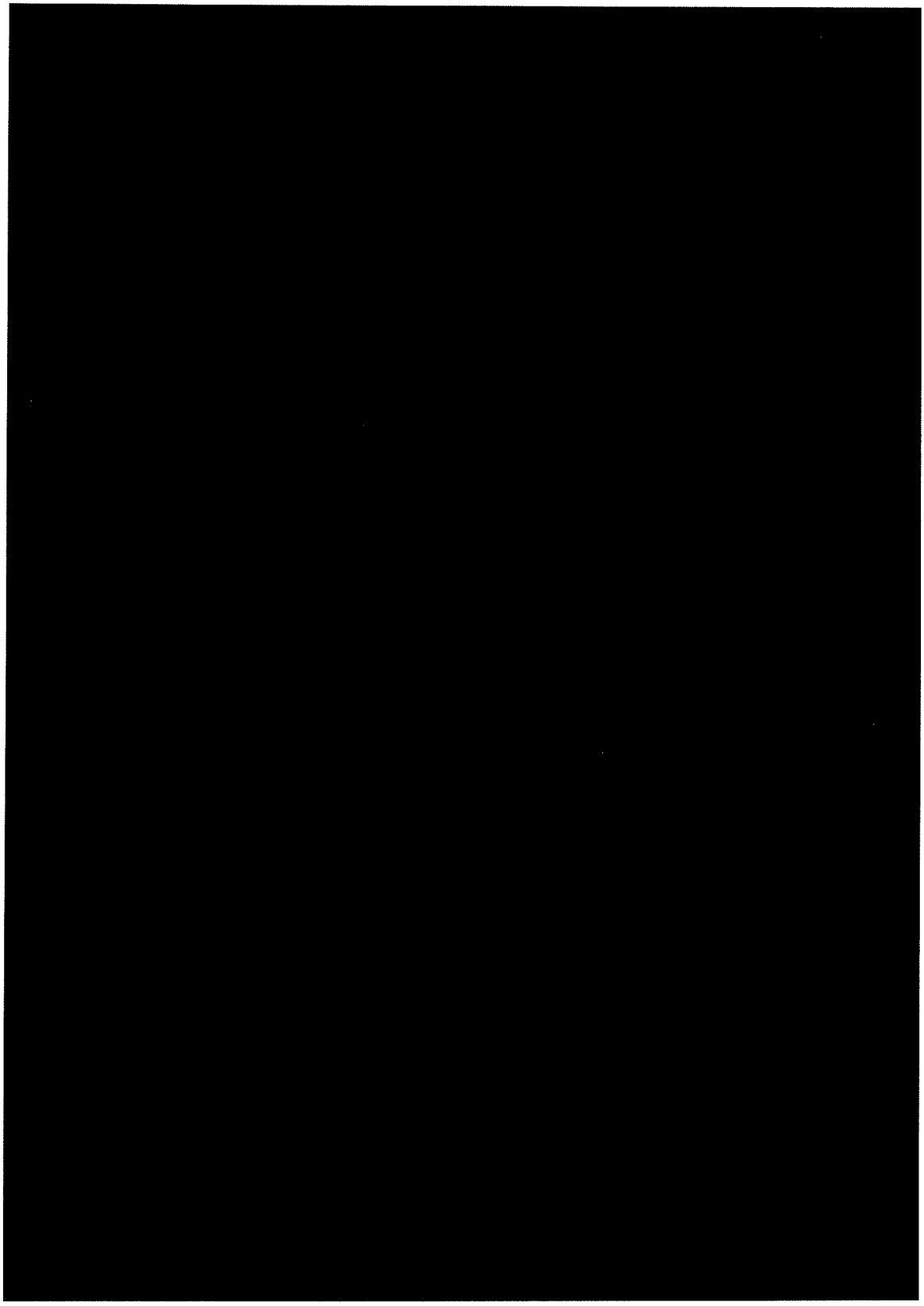




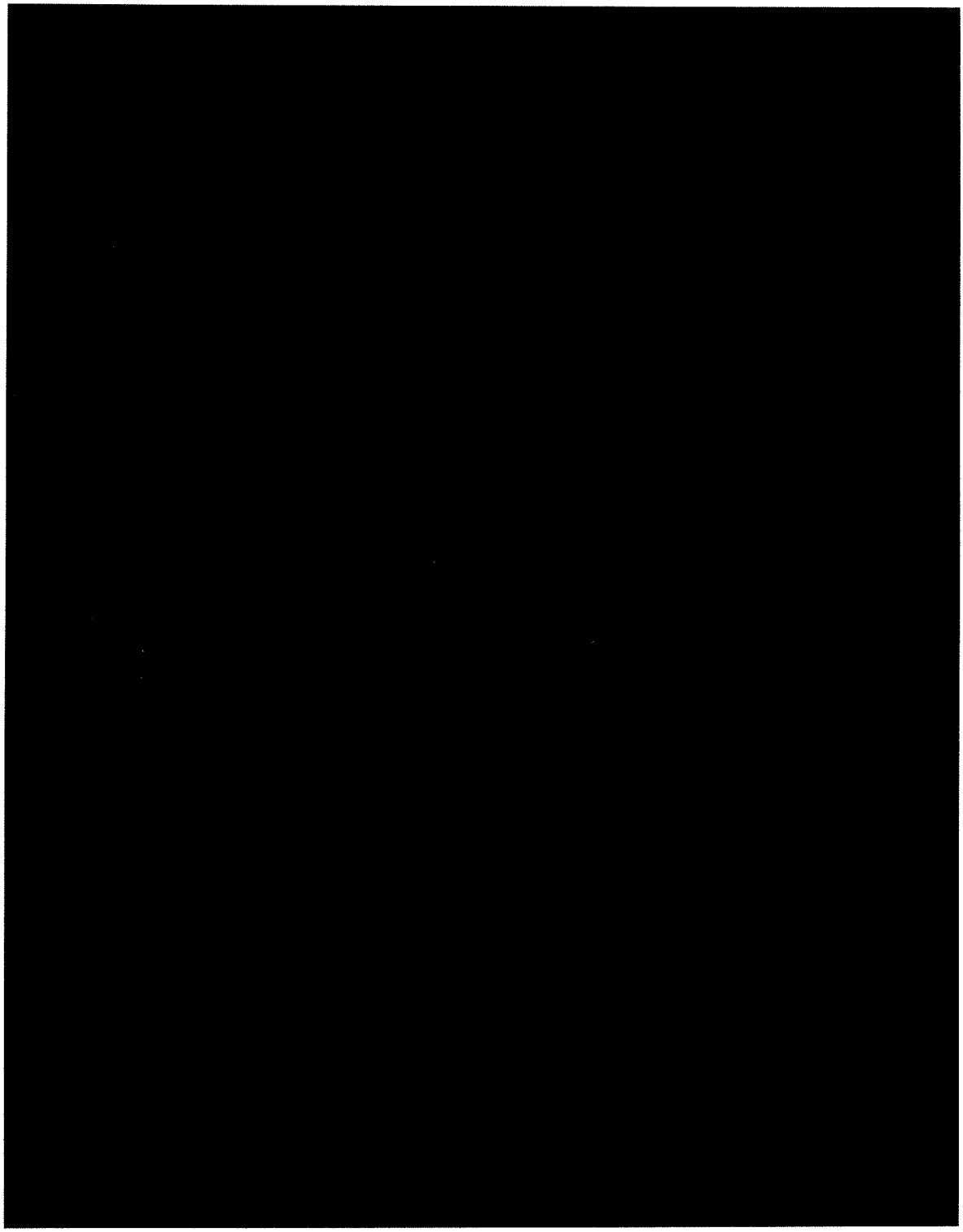






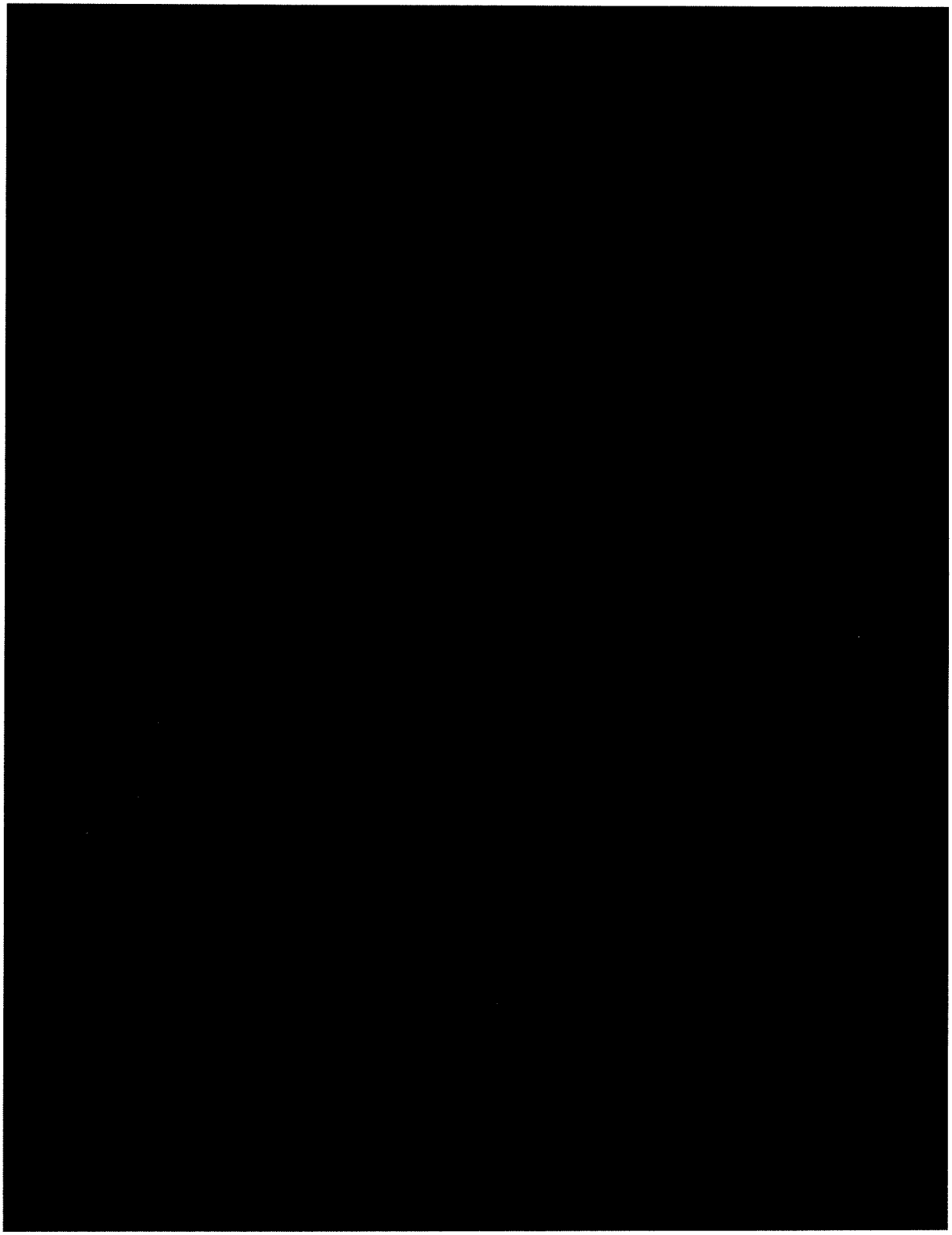


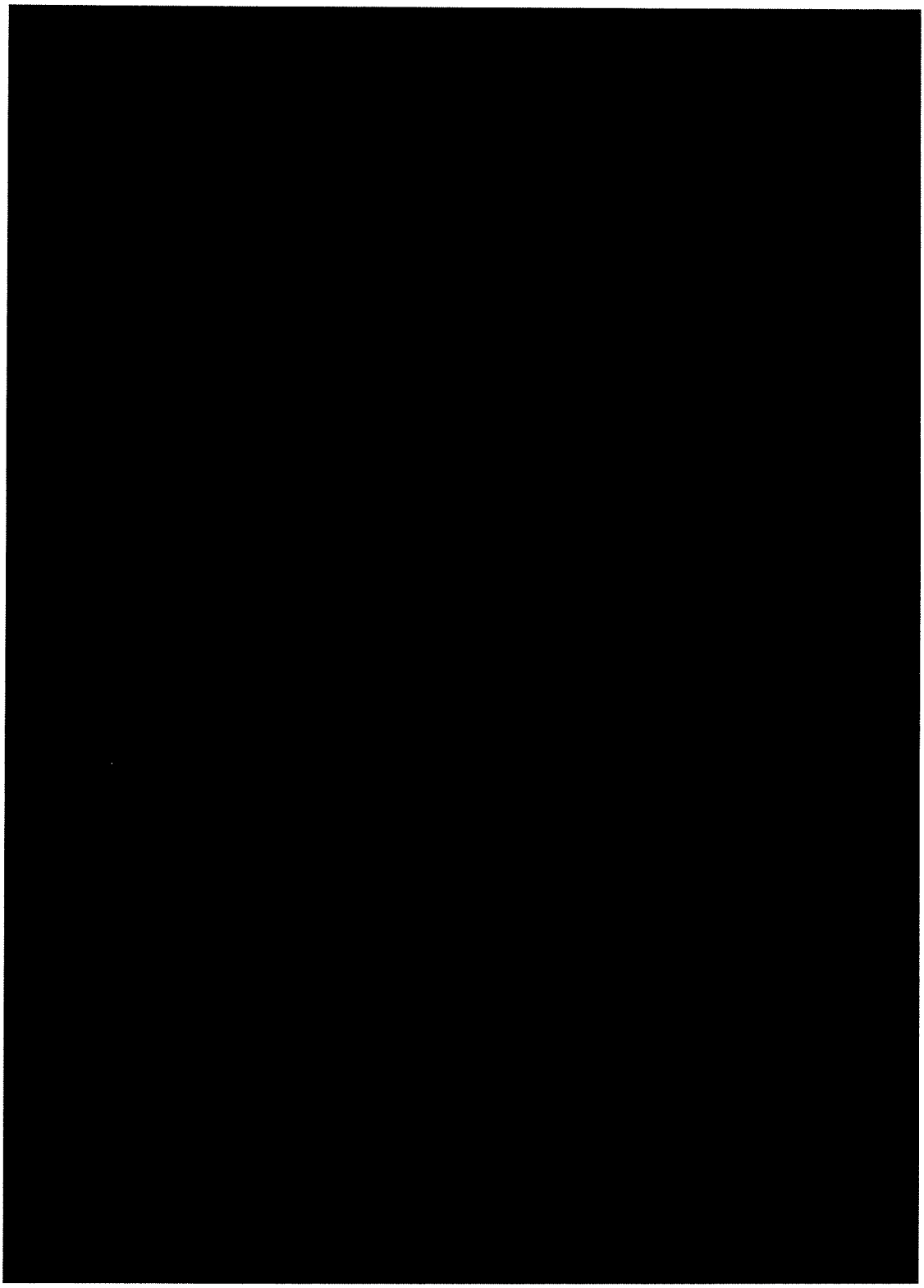
Invasion of Privacy

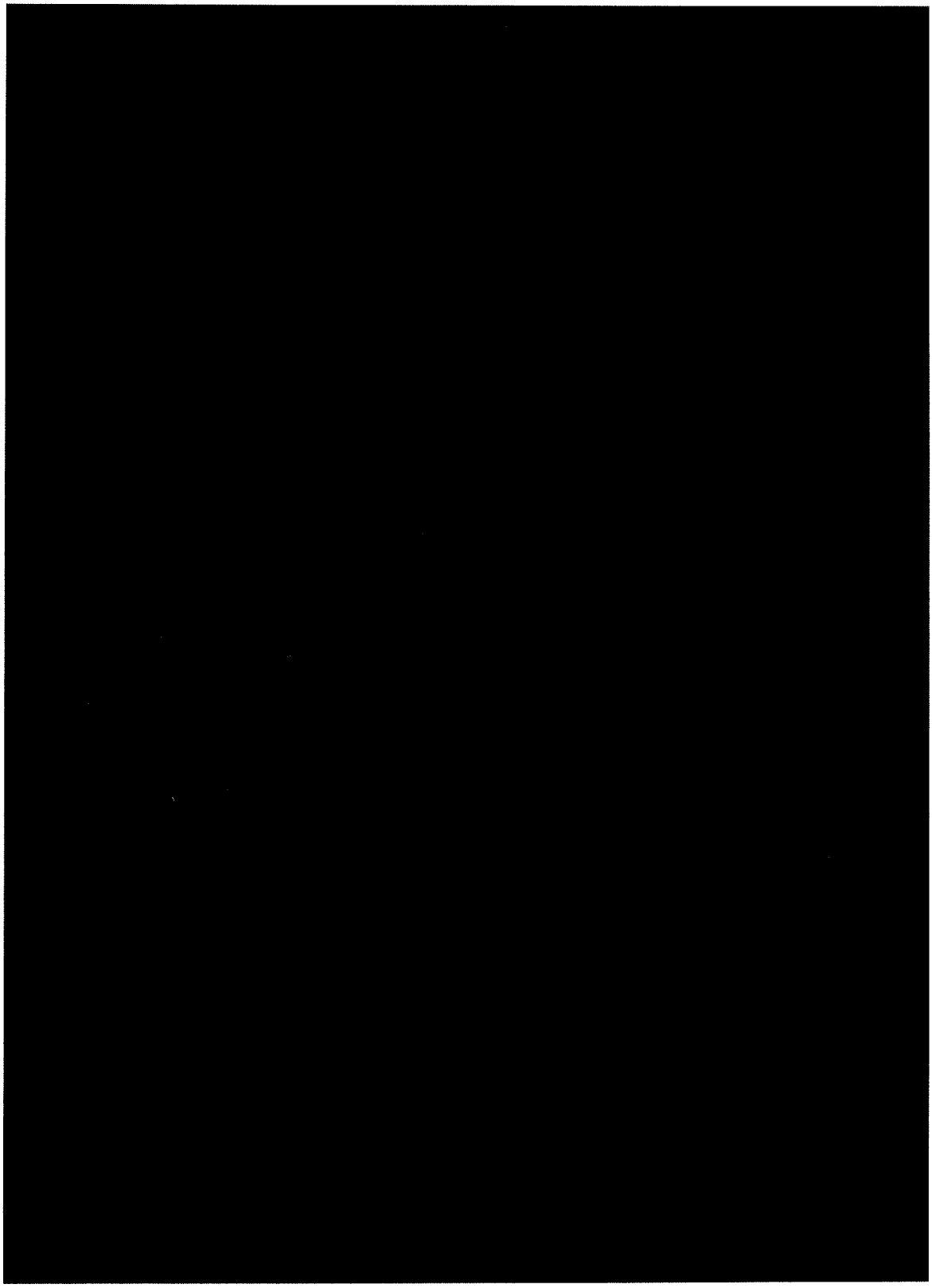


[redacted]

Obscenity







[redacted]

Hate

[redacted]

[redacted]

COPPA

[redacted]

[redacted]

Canned Response Cheat Sheet

Following is a list of the sections of this manual, along with brief descriptions of the canned responses mentioned in each. Since the Abuse can library contains as many as 80 canned responses, this list is not exhaustive. Please take some time to familiarize yourself with the Abuse category tree in Kana.

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VIA 17607561